

COMMONWEALTH OF MASSACHUSETTS

before the

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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Massachusetts Electric Company) D.T.E. 00-109

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**ATTORNEY GENERAL'S FIRST SET OF
DOCUMENT AND INFORMATION REQUESTS**

AG-1-1 Refer to Ms. Viapiano's Testimony, p. 3. Prior to March 1, 1998 how did the Company obtain the services described on lines 3 through 7-- looped transmission service and ancillary services?

AG-1-2 Refer to Ms. Viapiano's Testimony, p. 3. Prior to March 1, 1998 how did the Company recover the cost of the services described on lines 3 through 7--looped transmission service and ancillary services? Specify which rate elements were designed to recover these costs.

AG-1-3 Refer to Ms. Viapiano's Testimony, p. 3. Prior to March 1, 1998 to what specific accounts did

the Company book the costs of the services described on lines 3 through 7--looped transmission service and ancillary services? Does the Company continue to record these costs in the same accounts? If not, please explain the change in accounting method. Include the account numbers.

AG-1-4 Refer to Ms. Viapiano's Testimony, p. 3. Please provide a detailed description of the services described on lines 3 through 7--looped transmission service and ancillary services. Include the explanation of how these specific services differ from those provided under NEP's FERC Electric Tariff No. 9. Are any of these services provided to a limited number of the Company's customers-a single rate class or customers with certain characteristics? If yes, please describe the services and the customers that receive these services.

AG-1-5 Refer to Ms. Viapiano's Testimony, p. 3. Prior to March 1, 1998 how did the Company obtain the services described on lines 11 through 14-- Non-PTF access, metering, transformation, ancillary and direct assignment services?

AG-1-6 Refer to Ms. Viapiano's Testimony, p. 3. Prior to March 1, 1998 how did the Company recover the cost of the services described on lines 11 through 14-- Non-PTF access, metering, transformation, ancillary and direct assignment services? Specify which rate elements were designed to recover these costs.

AG-1-7 Refer to Ms. Viapiano's Testimony, p. 3. Prior to March 1, 1998 to what specific accounts did the Company book the costs of the services described on lines 11 through 14-- Non-PTF access, metering, transformation, ancillary and direct assignment services? Does the Company continue to record these costs in the same accounts? If not, please explain the change in accounting method. Include the account numbers.

AG-1-8 Refer to Ms. Viapiano's Testimony, p. 3. Please describe in detail each of the services described on lines 11 through 14-- Non-PTF access, metering, transformation, ancillary and direct assignment services. Are any of these services provided to a limited number of the Company's customers-a single rate class or customers with certain characteristics? If yes, please describe the services and the customers that receive these services.

AG-1-9 Refer to Ms. Viapiano's Testimony, p. 3. Prior to March 1, 1998 how did the Company obtain the services described on lines 18 through 20-- Scheduling System Control and Dispatch, Energy Administration Service and Reliability Administration Service?

AG-1-10 Refer to Ms. Viapiano's Testimony, p. 3. Prior to March 1, 1998 how did the Company recover the cost of the services described on lines 18 through 20-- Scheduling System Control and Dispatch,

Energy Administration Service and Reliability Administration Service? Specify which rate elements were designed to recover these costs.

AG-1-11 Refer to Ms. Viapiano's Testimony, p. 3. Prior to March 1, 1998 to what specific accounts did the Company book the costs of the services described on lines 18 through 20-- Scheduling System Control and Dispatch, Energy Administration Service and Reliability Administration Service? Does the Company continue to record these costs in the same accounts? If not, please explain the change in accounting method. Include the account numbers.

AG-1-12 Refer to Ms. Viapiano's Testimony, p. 3. Please describe in detail each of the services described on lines 18 through 20-- Scheduling System Control and Dispatch, Energy Administration Service and Reliability Administration Service. Are any of these services provided to a limited number of the Company's customers-a single rate class or customers with certain characteristics? If yes, please describe the services and the customers that receive these services.

AG-1-13 Please provide the cost studies supporting the unbundling of the Company's distribution, transmission and generation rates for effect March 1, 1998. Annotate these cost studies showing all transmission and transmission related costs.

AG-1-14 Refer to Ms. Viapiano's Testimony, p. 2, lines 20 through 22. Please explain what specific changes occurred effective January 1, 1999 when the Company began taking service under ISO-NE's Tariff No. 1. Were transmission services increased? If yes, please explain what benefits were obtained. Were costs increased? If yes, please explain the basis for the increase and the benefits received.

AG-1-15 Refer to Ms. Viapiano's Testimony, pp. 4 and 5. Please explain in detail what specific services are provided by NEPOOL under the scheduling, system control and dispatch service surcharge. Include the explanation of how the NEPOOL scheduling system control and dispatch services are different than those provided by ISO-NE. What specific costs go into each of these rates (NEPOOL's and ISO-NE's scheduling system control and dispatch).

AG-1-16 Since it first unbundled rates has the Company changed the method it uses to determine its transmission rates? If yes, please explain each change and why each change was made.

AG-1-17 Since it first unbundled its rates has the Company changed the categories of costs that it includes in its transmission rates? If yes, please explain each change and the why each change was made.

AG-1-18 How are Eastern Edison's transmission costs accounted for in the development of the Company's Transmission rates. Provide all details supporting the Eastern Edison costs that are included in the current rates. Include copies of all regulatory orders approving the Company's method for including Eastern Edison costs in its transmission rates. Please provide a breakdown of Eastern Edison transmission costs that are included in the Company's current transmission rates.

AG-1-19 Refer to Ms. Viapiano's Testimony, p. 7. Please explain in detail the services provided by ISO-NE categorized as Energy Administration Service. If the ISO-NE rates for these services are approved by FERC, please provide the citation to the FERC order(s) approving the 2000 and 2001 rates.

AG-1-20 Refer to Ms. Viapiano's Testimony, p. 7. Please explain in detail the services provided by ISO-NE categorized as Reliability Administration Service. If the ISO-NE rates for these services are approved by FERC, please provide the citation to the FERC order(s) approving the 2000 and 2001 rates.

AG-1-21 Refer to Ms. Viapiano's Testimony, p. 7, line 7. Please explain what is meant by "certain energy uplift charges." Are there other uplift charges? If yes, please explain how the Company is charged for these costs. Include a detailed explanation of all "uplift charges", how and by what entity the Company is billed for each category of "uplift charges" and how the Company recovers each category of "uplift charges" (through which specific rate elements).

AG-1-22 Refer to Ms. Viapiano's Testimony, p. 8. Please explain what services are provided to the Company by ISO-NE as Black Start Services. How are the rates for these services determined? Prior to restructuring how were the costs associated with Black Start Services recovered?

AG-1-23 Refer to Ms. Viapiano's Testimony, p. 8. Please explain what services are provided to the Company by ISO-NE as Reactive Power Services. How are the rates for these services determined? What is the "additional component on Reactive Power charges" that is being negotiated? Prior to restructuring how were the costs associated with Reactive Power Services recovered?

AG-1-24 Based on the most recent available data, what is Ms. Viapiano's estimate of 2001 transmission expenses. Please provide the revised estimate in the same form as presented in Ms. Viapiano's exhibits. Include the explanation of the key changes.

AG-1-25 Refer to Exhibit TMB-14. How does the Company incorporate any billing adjustments and/or corrections in the reconciliation of its transmission revenue and expense? Please provide the details of each adjustment and/or correction in excess of \$5,000 that is reflected in the Company's transmission cost and revenue reconciliation.

AG-1-26 Does the Company own any transmission assets? If yes, please provide a description of the assets and how the Company recovers the cost of these assets. Include the book value of the Company's transmission assets at December 31, 2000 and the related transmission expense for the year 2000.

AG-1-27 Does the Company provide any transmission services to customers other than its retail distribution customers? If yes, please explain the services provided and how the rates for these services are set. Include the expenses and revenues for these services for the years 1998 (post RAD), 1999 and 2000. How does the Company account for these revenues and expenses on its books and in the transmission cost reconciliation?

AG-1-28 Are any transmission costs included in the Company's Standard Offer costs? If yes, please explain the nature of these costs and why they are not included in the Company's transmission rates. Explain how the Company is billed and by what entity. Include a breakdown of the Standard Offer transmission expenses for the years 1998 (post RAD), 1999 and 2000.

AG-1-29 Are any transmission costs included in the Company's Default Service costs? If yes, please explain the nature of these costs and why they are not included in the Company's transmission rates. Explain how the Company is billed and by what entity. Include a breakdown of the Default Service transmission expenses for the years 1998 (post RAD), 1999 and 2000.

AG-1-30 Please provide the most recent transmission cost of service (revenue requirement) for NEP and for Montaup that supports the current transmission rates being charged the Company. Include all cost elements--rate base, expenses, return, capital structure and all adjustments, including those made to reflect transfers from transmission to generation to compensate for generation related financing benefits (e.g., pollution control bonds).

AG-1-31 Refer to Exhibit TMB-14. Please provide all supporting workpapers, calculations, allocations and other relevant data associated with the revenue and expenses appearing in this exhibit. These materials must include actual monthly bill determinants for each rate class, class rates, monthly revenue adjustments by class, monthly transmission bills by provider, monthly transmission expense adjustments by provider, actual monthly transmission bill determinants used to bill the Company for transmission services by each provider, and monthly transmission bill adjustments by provider. Include the explanation of significant transmission revenue and expense adjustments.

AG-1-32 Please provide a listing of all transmission rate proceedings that affect or have affected the Company's 2000 or 2001 transmission expenses-docket number, filing date and date of final order. Identify the proceedings where the Company actively intervened, indicate the issues that the Company raised and whether the Company prevailed.

AG-1-33 Since March 1, 1998 has the Company entered into any settlements that have affected the Company's transmission revenue or expense. If yes, please provide the details of these settlements including the revenue and/or expense impact and when the revenue and/or expense impact was or will be reflected in the Company's retail transmission rates. Include the citation to all regulatory approvals.

AG-1-34 Please explain what impact the transmission rate treatment afforded Taunton Municipal Lighting Plant, Middleborough Gas and Electric Department and Pascoag Fire District as the result of the NEES/EUA merger had on the Company's retail customers. Refer to New England Power Company's October 29, 1999 filing, FERC Docket Nos. EC99-770-000 & EER99-2832-000.

AG-1-35 Please provide a copy of the final reconciliation of the Company's fuel adjustment charge (pre RAD). How and when was the final balance recovered from customers or refunded to customers?

Dated: March 30, 2001